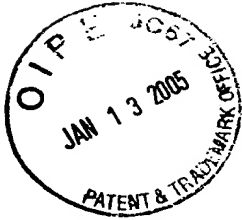


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PATENT APPLICATION
09/156,334

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**In The United States Patent and Trademark Office
On Appeal From The Examiner To The Board
of Patent Appeals and Interferences**

In re Application of: Ranjit N. Notani et al.
Serial No.: 09/156,334
Filing Date: September 18, 1998
Group Art Unit: 3629
Examiner: Thomas A. Dixon
Title: *Method and System for Managing Collaboration Within and
Between Enterprises*

MAIL STOP: REPLY BRIEF

Commissioner for Patents
P.O. Box 1450
Alexandria, Virginia 22313-1450

Dear Sir:

<p style="text-align: center;">CERTIFICATE OF MAILING BY EXPRESS MAIL</p> <p>I hereby certify that this communication is being deposited with the United States Postal Service "Express Mail Post Office to Addressee" under 37 C.F.R. § 1.10 on the date indicated below and is addressed to Mail Stop: Reply Brief, Commissioner For Patents, P.O. Box 1450, Alexandria, Virginia 22313-1450.</p> <p><i>Willie Jiles</i> _____ Willie Jiles</p> <p>Date: <u>1-13-2005</u></p> <p>Exp. Mail Receipt No. EV 323312680 US</p>
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Reply Brief

Appellants respectfully submit this Reply Brief under 37 C.F.R. § 1.193(b)(1), in response to the Examiner's Answer mailed November 16, 2004.

Appellants filed an Appeal Brief on September 1, 2004, explaining clearly and in detail why the final rejection of Claims 1-7, 10-12, 15-20, and 48 is improper and should be reversed by the Board. As explained in more detail below, the Examiner's final rejection of these claims cannot be properly maintained. Appellants respectfully request the Board to reverse this final rejection and instruct the Examiner to issue a Notice of Allowance with respect to these claims.

Argument

The rejection of Claims 1-7, 10-12, 15-20, and 48 under 35 U.S.C. § 103(a) as being unpatentable over the proposed *Randell-Teschler* combination is improper and should be reversed by the Board.

**Appellants' Brief Contains a Statement Regarding
Related Appeals and Interferences**

The Examiner states, "The brief does not contain a statement identifying the related appeals and interferences which will directly affect or be directly affected by or have a bearing on the decision in the pending appeal." (Examiner's Answer, Page 2). Appellants disagree with the Examiner. Appellants clearly stated in their Brief, "There are no known appeals or interferences which will directly affect or be directly affected by or have a bearing on the Board's decision regarding this Appeal." (Appellants' Brief, Page 2).

**Appellants Separately Argued the Patentability of Groups 1 and 2
Over the Proposed *Randell-Teschler* Combination**

The Examiner also states, "The appellant's statement in the brief that certain claims do not stand or fall together is not agreed with because the arguments to groups I and II are to the same features." (Examiner's Answer, Page 2). Appellants disagree with the Examiner. Group 1 includes independent Claim 1 and dependent Claims 3-4, and Group 2 includes independent Claim 2. Appellants' arguments with respect to the patentability of independent Claim 1 over the proposed *Randell-Teschler* combination are different from Appellant's arguments with respect to the patentability of independent Claim 2 over the proposed *Randell-Teschler* combination. Appellants argued that the proposed *Randell-Teschler* combination fails to disclose, teach, or suggest *predefined, executable software functions*, as recited in independent Claims 1 and 2, but neither Appellants' arguments with respect to the patentability of independent Claim 1 over the proposed *Randell-Teschler* combination nor Appellants' arguments with respect to the patentability of independent Claim 2 over the proposed *Randell-Teschler* combination were limited to this particular deficiency of the

proposed *Randell-Teschler* combination.

With respect to the patentability of independent Claim 1 over the proposed *Randell-Teschler* combination, Appellants argued that, because the proposed *Randell-Teschler* fails to disclose, teach, or suggest ***predefined, executable software functions***, as recited in independent Claim 1, the proposed *Randell-Teschler* combination necessarily fails to disclose, teach, or suggest, as recited in independent Claim 1:

- the computer-implemented process operable, when executing on the computer system, to communicate ***a first one or more of the predefined, executable software functions*** to a first one of the distributed nodes associated with a corresponding first one of the plurality of physically separated enterprises and, in connection with performance of ***the first one or more predefined, executable software functions*** at the first one of the distributed nodes, ***interact with the first one of the distributed nodes associated with the corresponding first one of the plurality of physically separated enterprises through performance of the first one or more predefined, executable software functions at the first one of the distributed nodes***; or
- the computer-implemented process operable, when executing on the computer system, to communicate ***a second one or more of the predefined, executable software functions*** to a second one of the distributed nodes associated with a corresponding second one of the plurality of physically separated enterprises and, in connection with performance of ***the second one or more predefined, executable software functions*** at the second one of the distributed nodes, ***interact with the second one of the distributed nodes associated with the corresponding second one of the plurality of physically separated enterprises through performance of the second one or more predefined, executable software functions at the second one of the distributed nodes, the second one or more predefined, executable software functions performed at the second one of the distributed nodes using as input a result of the performance of the first one or more predefined, executable software functions at the first one of the distributed nodes***.

(Appellant's Brief, Pages 8-9). With respect to the patentability of independent Claim 2 over the proposed *Randell-Teschler* combination, Appellants did not argue that the proposed *Randell-Teschler* combination fails to disclose, teach, or suggest these limitations.

With respect to the patentability of independent Claim 2 over the proposed *Randell-Teschler* combination, Appellants argued that, because the proposed *Randell-Teschler* combination fails to disclose, teach, or suggest ***predefined, executable software functions***, as recited in independent Claim 2, the proposed *Randell-Teschler* combination necessarily fails to disclose, teach, or suggest, as recited in independent Claim 2:

- the computer-implemented process operable, when executing on a computer system, to store ***a set of predefined, executable software functions*** for a workflow that are to be performed at a plurality of distributed nodes;
- the computer-implemented process operable, when executing on a computer system, to manage the workflow by automatically interacting with the workflow at each of the distributed nodes to perform ***the predefined, executable software functions***; and
- ***the set of predefined, executable software functions*** operable to generate a workflow between a plurality of enterprises.

(Appellant's Brief, Page 11). With respect to the patentability of independent Claim 1 over the proposed *Randell-Teschler* combination, Appellants did not argue that the proposed *Randell-Teschler* combination fails to disclose, teach, or suggest these limitations.

These limitations recited in independent Claims 1 and 2, and the arguments made to demonstrate the patentability of Claims 1 and 2 over the prior art, are plainly different. Appellants respectfully submit that, for at least these reasons, Groups 1 and 2 do not stand or fall together. Accordingly, Appellants respectfully request the Board to separately consider the patentability of Groups 1 and 2.

**Appellants' Claims are Patentable over the Proposed
Randell-Teschler combination**

Appellants note that Section 10 of the Examiner's Answer consists entirely of material repeated verbatim from the Office Action mailed December 10, 2003, and the Final Office Action mailed May 3, 2004. Section 11 of the Examiner's Answer consists of a response to Appellants' Appeal Brief. Below, Appellants specifically address the Examiner's response to Appellant's Appeal Brief.

Group 1 (Claims 1 and 3-4)

To maintain the rejection of independent Claim 1, the Examiner asserts that workflow execution software in *Randell* can be properly considered ***a computer implemented process***, as recited in independent Claim 1, that an agent in *Randell* can be properly considered ***one or more predefined, executable software functions***, as recited in independent Claim 1, and that

external organization service software in *Randell* can be properly considered **a distributed node**, as recited in independent Claim 1. (Examiner's Answer, Page 5). Appellants disagree with the Examiner.

In *Randell*, workflow execution software assigns an activity to an agent and communicates a packet of information associated with the assigned activity to the agent so that the agent can perform the assigned activity. (*Randell*, Column 4, Lines 10-14, Column 4, Line 61, through Column 5, Line 1, and Column 7, Lines 1-19). An agent is an individual user, a work group, an organization, or an automatic system, such as a production machine or other software process. (*Randell*, Abstract, Lines 1-4, and Column 2, Lines 50-56). To identify an agent for assignment of an activity, the workflow execution software dispatches a request to external organization service software, which, according to *Randell*, is organization service software external to the workflow execution software. (*Randell*, Figure 14, Column 6, Lines 59-63, and Column 14, Lines 46-48 and 56-58). In response to the request, the external organization service software communicates information to the workflow execution software that the workflow execution software then uses to identify an agent for assignment of the activity. (*Randell*, Figure 14, Column 14, Lines 58-64).

Thus, *Randell* fails to disclose, teach, or suggest that the workflow execution software in *Randell* stores any agents, that the workflow execution software in *Randell* communicates any agents to the external organization service software in *Randell*, and that the external organization service software in *Randell* performs any agents. Therefore, *Randell* necessarily fails to disclose, teach, or suggest, as recited in independent Claim 1:

- the workflow execution software **storing a set of agents for a distributed workflow involving a plurality of physically separated enterprises that are to be performed at a plurality of** external organization service software, **each of** the external organization service software **being associated with a corresponding one of the plurality of physically separated enterprises**;
- the workflow execution software **managing the distributed workflow involving the plurality of physically separated enterprises by automatically interacting with the distributed workflow involving the plurality of physically separated enterprises at each of** the external organization service software **associated with the plurality of physically separated enterprises to perform** the agents;
- the workflow execution software **communicating a first one or more of** the agents to

a first one of the external organization service software associated with a corresponding first one of the plurality of physically separated enterprises and, in connection with performance of the first one or more agents at the first one of the external organization service software, interacting with the first one of the external organization service software associated with the corresponding first one of the plurality of physically separated enterprises through performance of the first one or more agents at the first one of the external organization service software; and

- *the workflow execution software communicating a second one or more of the agents to a second one of the external organization service software associated with a corresponding second one of the plurality of physically separated enterprises and, in connection with performance of the second one or more agents at the second one of the external organization service software, interacting with the second one of the external organization service software associated with the corresponding second one of the plurality of physically separated enterprises through performance of the second one or more agents at the second one of the external organization service software, the second one or more agents performed at the second one of the external organization services software using as input a result of the performance of the first one or more agents at the first one of the external organization service software.*

Because of at least these deficiencies, the workflow execution software in *Randell* cannot be properly considered *a computer implemented process*, as recited in independent Claim 1, an agent in *Randell* cannot be properly considered *one or more of the predefined, executable software functions*, as recited in independent Claim 1, and the external organization service software in *Randell* cannot be properly considered *one of the distributed nodes*, as recited in independent Claim 1.

Teschler fails to make up for these deficiencies of *Randell*, and Appellants note that the Examiner does not assert otherwise.

For at least these reasons, the proposed *Randell-Teschler* combination fails to disclose, teach, or suggest the particular combination of limitations specifically recited in independent Claim 1. Independent Claim 1 is therefore allowable over the proposed *Randell-Teschler* combination. Because dependent Claims 3 and 4 depend on independent Claim 1, dependent Claims 3 and 4 are therefore also allowable over the proposed *Randell-Teschler* combination. Appellants respectfully submit that the rejection of these claims is improper and should be reversed by the Board.

Group 2 (Claim 2)

To maintain the rejection of independent Claim 2, the Examiner asserts that the workflow execution software in *Randell* can be properly considered ***a computer implemented process***, as recited in independent Claim 2, that an agent in *Randell* can be properly considered ***a predefined, executable software function***, as recited in independent Claim 2, and that the external organization service software in *Randell* can be properly considered ***a distributed node***, as recited in independent Claim 2. (Examiner's Answer, Page 5). Appellants disagree with the Examiner.

As discussed above, *Randell* fails to disclose, teach, or suggest that the workflow execution software in *Randell* stores any agents and that the external organization service software in *Randell* performs any agents. Therefore, *Randell* necessarily fails to disclose, teach, or suggest, as recited in independent Claim 2:

- the workflow execution software ***storing a set of agents for a workflow that are to be performed at a plurality of*** external organization service software; and
- the workflow execution software ***managing the workflow by automatically interacting with the workflow at each of the*** external organization service software ***to perform*** the agents.

Moreover, *Randell* fails to disclose, teach, or suggest that ***the set of agents generates a workflow between a plurality of enterprises***, as further particularly recited in independent Claim 2. As discussed above, in *Randell*, an agent merely performs an assigned activity.

Because of at least these deficiencies, the workflow execution software in *Randell* cannot be properly considered ***a computer implemented process***, as recited in independent Claim 2, an agent in *Randell* cannot be properly considered ***a predefined, executable software function***, as recited in independent Claim 2, and the external organization service software in *Randell* cannot be properly considered ***a distributed node***, as recited in independent Claim 2.

Teschler fails to make up for these deficiencies of *Randell*, and Appellants note that

the Examiner does not assert otherwise.

For at least these reasons, the proposed *Randell-Teschler* combination fails to disclose, teach, or suggest the particular combination of limitations specifically recited in independent Claim 2. Independent Claim 2 is therefore allowable over the proposed *Randell-Teschler* combination. Appellants respectfully submit that the rejection of these claims is improper and should be reversed by the Board.

Group 3 (Claims 5-7, 10-12, and 48)

To maintain the rejection of independent Claim 5, the Examiner asserts that steps 1208 and 1222 of a dispatch task process disclosed in *Randell* can be properly considered a *review* of a *preliminary collaboration*, as recited in independent Claim 5, and that step 1308 of an evaluate routing node process in *Randell* can be properly considered *a final collaboration based on the preliminary collaboration*, as recited in independent Claim 5. (Examiner's Answer, Page 6). Appellants disagree with the Examiner.

Steps 1208 and 1222 of the dispatch task process in *Randell* cannot be properly considered a *review of a preliminary collaboration*, as recited in independent Claim 5. Step 1208 shows the workflow execution software in *Randell* rejecting a packet of information associated with an already defined activity up for assignment to an agent if entry conditions for starting the already defined activity have not been satisfied. (*Randell*, Figure 12, Column 4, Lines 10-13, and Column 13, Lines 49-59). Step 1222 shows the workflow execution software determining whether exit conditions have been satisfied on an activity that an agent has completed. (*Randell*, Figure 12 and Column 14, Lines 1-11). An activity associated with a packet of information rejected at step 1208 never gets assigned to an agent for completion. An activity having exit conditions evaluated at step 1222 has been completed by an agent. Thus an activity at step 1208 is necessarily separate from an activity at step 1222. Because steps 1208 and 1222 involve activities that are necessarily separate from each other, steps 1208 and 1222 cannot both together be properly considered review of *a preliminary collaboration*, as recited in independent Claim 5. Moreover, if the workflow execution

software in *Randell* did not reject a packet of information at step 1208, the workflow execution software would assign an activity associated with the packet of information to a single agent for completion. A single agent has completed an activity having exit conditions evaluated at step 1222. Thus neither step 1208 nor step 1222 can be properly considered review of a preliminary ***collaboration***, as recited in independent Claim 5. Furthermore, steps 1208 and 1222 involve activities that have already been fully defined. Thus neither step 1208 nor step 1222 can be properly considered review of a ***preliminary*** collaboration, as recited in independent Claim 5.

Step 1308 of an evaluate routing node process in *Randell* cannot be properly considered ***a final collaboration based on the preliminary collaboration***, as recited in independent Claim 5. At step 1308, if a routing node includes a continue condition, the workflow execution software in *Randell* waits for completion of all nodes ahead of the routing node in a work queue before executing the routing node to select output nodes for placement into the work queue. (*Randell*, Figure 13, Column 5, Lines 47-50, and Column 14, Lines 12-19 and 27-37). Because only the workflow execution software executes the routing node, the routing node at step 1308 cannot be properly considered a final ***collaboration*** based on the preliminary collaboration, as recited in independent Claim 5. Moreover, the routing node at step 1308 is entirely unrelated to the work node in the dispatch task process in *Randell* that the Examiner asserts can be properly considered ***a preliminary collaboration***, as recited in independent Claim 5. Because the routing node is unrelated to the work node, the routing node at step 1308 cannot be properly considered a final collaboration ***based on the preliminary collaboration***, as recited in independent Claim 5.

Teschler fails to make up for these deficiencies of *Randell*, and Appellants note that the Examiner does not assert otherwise.

For at least these reasons, the proposed *Randell-Teschler* combination fails to disclose, teach, or suggest the particular combination of limitations specifically recited in independent Claims 5. Independent Claims 48 recites limitations substantially similar to limitations recited in independent Claim 5. Therefore, for at least the same reasons, the

proposed *Randell-Teschler* combination fails to disclose, teach, or suggest the particular combination of limitations specifically recited in independent Claims 48. Independent Claims 5 and 48 are therefore allowable over the proposed *Randell-Teschler* combination. Because dependent Claims 6-7 and 10-12 depend on independent Claim 5, dependent Claims 6-7 and 10-12 are therefore also allowable over the proposed *Randell-Teschler* combination. Appellants respectfully submit that the rejection of these claims is improper and should be reversed by the Board.

Group 4 (Claims 15-19)

To maintain the rejection of independent Claim 15, the Examiner asserts that steps 1208 and 1222 of the dispatch task process in *Randell*, step 1308 of the evaluate routing node process in *Randell*, and work nodes 308, 310, 312, and 316 of an engineering change order (ECO) procedure in *Randell* can all together be properly considered ***a final collaboration approved by first, second, and third enterprises***, as recited in independent Claim 15. (Examiner's Answer, Page 6). Appellants disagree with the Examiner.

As discussed above, an activity at step 1208 of the dispatch task process is necessarily separate from an activity at step 1222. Because steps 1208 and 1222 involve activities that are necessarily separate from each other, steps 1208 and 1222 cannot together be properly considered ***a final collaboration approved by first, second, and third enterprises***, as recited in independent Claim 15. Moreover, as discussed above, if the workflow execution software in *Randell* did not reject a packet of information at step 1208, the workflow execution software would assign an activity associated with the packet of information to a single agent for completion. A single agent has completed an activity having exit conditions evaluated at step 1222. Thus neither an activity at step 1208 nor an activity at step 1222 can be properly considered a final ***collaboration approved by first, second, and third enterprises***, as recited in independent Claim 15. Furthermore, as discussed above, steps 1208 and 1222 involve activities that have already been fully defined. Thus neither an activity at step 1208 nor an activity at step 1222 can be properly considered a final collaboration ***approved*** by first, second, and third enterprises, as recited in independent Claim 15.

As further discussed above, at step 1308 of the evaluate routing node process, if a routing node includes a continue condition, the workflow execution software in *Randell* waits for completion of all nodes ahead of the routing node in a work queue before executing the routing node to select output nodes for placement into the work queue. Because only the workflow execution software executes the routing node, the routing node at step 1308 cannot be properly considered a final **collaboration** approved by first, second, and third enterprises, as recited in independent Claim 15. Moreover, the dispatch task process in *Randell* involves a working node and the evaluate routing node process in *Randell* involves a routing node. A working node defines an activity for an agent to perform. (*Randell*, Column 5, Lines 36-38). The workflow execution software executes a routing node to identify subsequent activities for assignment to agents. (*Randell*, Column 5, Lines 47-50). Because the evaluate routing node process and the dispatch task process involve nodes that are completely different from each other, steps 1208 and 1222 of the dispatch task process and step 1308 of the evaluate routing node process cannot all together be properly considered **a** final collaboration approved by first, second, and third enterprises, as recited in independent Claim 15.

Work nodes 308, 310, 312, and 316 of the ECO procedure in *Randell* do not make up for any of the deficiencies of steps 1208 and 1222 of the dispatch task process and step 1308 of the evaluate routing node process in *Randell* noted above. In the ECO procedure in *Randell*, the workflow execution software executes routing node 306 to split an engineering specification into three separate components, *i.e.*, an electrical design specification, a mechanical design specification, and cost information. (*Randell*, Figure 3, Column 7, Lines 46-52). The workflow execution software then assigns work node 308, which is an electrical engineering (EE) design work node, to an agent designated AGENT-2 for making engineering changes to the electrical design specification; assigns work node 310, which is a mechanical engineering (ME) design work node, to an agent designated AGENT-3 for making engineering changes to the mechanical design specification; and assigns work node 312, which is cost analysis work node, to an agent designated AGENT-4 for making engineering changes to the cost information. (*Randell*, Figure 3, Column 7, Line 57, through Column 8 Line 6). AGENT-2, AGENT-3, and AGENT-4 each make engineering changes to

their respective components of the engineering specification, and an agent designated AGENT-1 executes work node 316 to approve or reject the engineering changes to the engineering specification. (*Randell*, Figure 3, Column 8, Lines 2-11). If AGENT-1 approves the engineering changes, AGENT-1 releases the changed engineering specification. (*Randell*, Figure 3, Column 8, Lines 19-22 and 33-38). If AGENT-1 instead rejects the engineering changes, the workflow execution software returns the electrical design specification to AGENT-2, the mechanical design specification to AGENT-3, and the cost information to AGENT-3 to redo the engineering changes. (*Randell*, Figure 3, Column 8, Lines 38-44).

In the ECO procedure in *Randell*, only one agent, AGENT-1, executes work node 316 to approve or reject engineering changes. Even assuming for the sake of argument that an agent in *Randell* could be properly considered *an enterprise*, as recited in independent Claim 15, work node 316 still could not be properly considered a final collaboration approved *by first, second, and third enterprises*, as recited in independent Claim 15. Moreover, AGENT-2, AGENT-3, and AGENT-4 each perform an activity that involves making changes to a component of an engineering specification. Nowhere does *Randell* disclose, teach, or even suggest that AGENT-2, AGENT-3, and AGENT-4 approve the activities they perform. In fact, according to *Randell*, the activities are fully defined before the workflow execution software in *Randell* assigns work nodes 308, 310, and 312 to AGENT-2, AGENT-3, and AGENT-4. (*Randell*, Column 5, Lines 36-38). Even assuming again for the sake of argument that an agent in *Randell* could be properly considered *an enterprise*, as recited in independent Claim 15, work nodes 308, 310, and 312 still could not be properly considered a final collaboration *approved* by first, second, and third enterprises, as recited in independent Claim 15. Furthermore, the dispatch task process in *Randell*, the evaluate routing node process in *Randell*, and the ECO procedure in *Randell* are all completely separate from each other. Steps from the dispatch task process and the evaluate routing node process and nodes from the ECO procedure cannot all together be properly considered *a* final collaboration approved by first, second, and third enterprises, as recited in independent Claim 15.

Teschler fails to make up for these deficiencies of *Randell*, and Appellants note that

the Examiner does not assert otherwise.

For at least these reasons, the proposed *Randell-Teschler* combination fails to disclose, teach, or suggest the particular combination of limitations specifically recited in independent Claim 15. Independent Claim 15 is therefore allowable over the proposed *Randell-Teschler* combination. Because dependent Claims 16-19 depend on independent Claim 15, dependent Claims 16-19 are therefore also allowable over the proposed *Randell-Teschler* combination. Appellants respectfully submit that the rejection of these claims is improper and should be reversed by the Board.

Group 5 (Claim 20)

To maintain the rejection of independent Claim 20, the Examiner asserts that a request communicated from the workflow execution software in *Randell* to the external organization service software in *Randell* can be properly considered ***a first predefined set of data*** and ***a second predefined set of data***, as recited in independent Claim 20. (Examiner's Answer, Page 6). Appellants disagree with the Examiner.

As discussed above, to identify an agent for assignment of an activity, the workflow execution software in *Randell* dispatches a request to the external organization service software in *Randell*, which is organization service software external to the workflow execution software. In response to the request, the external organization service software communicates information to the workflow execution software that the workflow execution software then uses to identify an agent for assignment of the activity.

The external organization service software only responds to a request from the workflow execution software to facilitate identification of an agent for assignment of an activity. Nowhere does *Randell* disclose, teach, or even suggest that the external organization service software performs any activities defined in any work nodes. Thus the external organization service software cannot be properly considered ***a first node*** where ***operation of a first portion of a collaboration*** occurs, as recited in independent Claim 20, or ***a second***

node where *operation of a second portion of the collaboration* occurs, as recited in independent Claim 20. Because the external organization service software cannot be properly considered *a first node*, as recited in independent Claim 20, or *a second node*, as recited in independent Claim 20, information communicated from the external organization service software to the workflow execution software cannot be properly considered a first predefined set of data collected in response to an automatic query *of the first node* for the first set of data, as recited in independent Claim 20, or a second predefined set of data collected in response to an automatic query *of the second node* for the second set of data, as recited in independent Claim 20.

Moreover, the external organization service software is a single entity. Thus the external organization service software cannot be properly considered *both* a first node where operation of a first portion of a collaboration occurs, as recited in independent Claim 20, *and* a second node where operation of a second portion of the collaboration occurs, as recited in independent Claim 20. Because the external organization service software cannot be properly considered *both* a first node, as recited in independent Claim 20, *and* a second node, as recited in independent Claim 20, information communicated from the external organization service software to the workflow execution software cannot be properly considered *both* a first predefined set of data associated with operation of a first portion of a collaboration at a first node of a first enterprise collected in response to an automatic query of the first node for the first set of data, as recited in independent Claim 20, *and* a second predefined set of data associated with operation of a second portion of a collaboration at a second node of a second enterprise collected in response to an automatic query of the second node for the second set of data, as recited in independent Claim 20.

Teschler fails to make up for these deficiencies of *Randell*, and Appellants note that the Examiner does not assert otherwise.

For at least these reasons, the proposed *Randell-Teschler* combination fails to disclose, teach, or suggest all elements of independent Claim 20. Independent Claim 20 is therefore allowable over the proposed *Randell-Teschler* combination. Appellants respectfully

submit that the rejection of these claims is improper and should be reversed by the Board.

Conclusion

Appellants have demonstrated that the present invention, as claimed, complies with all statutory requirements for a U.S. Patent. Therefore, Appellants respectfully request the Board to reverse the final rejection of the Examiner and instruct the Examiner to issue a Notice of Allowance with respect to all pending claims.

Appellants believe no fees are due. Nonetheless, the Commissioner is hereby authorized to charge any fee and credit any overpayment to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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